

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

In re:	:	Chapter 11
	:	
ASSUNCAO BROS, INC.	:	Case No. 22-16159-CMB
	:	
Debtor,	:	
	:	

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE  
OF PAPERS PURSUANT TO BANKRUPTCY RULES 9010 AND 2002**

**NOTICE IS HEREBY GIVEN** that pursuant to Rules 9010 and 2002 of the Federal Rules of Bankruptcy Procedure, the undersigned, is counsel for the **Iron Workers Local 11 Benefit Funds, the Iron Workers Local 399 Benefit Funds** and the **Iron Workers District Council Philadelphia and Vicinity Benefit Funds**. All three entities are creditors in the above captioned matter. The undersigned hereby requests that all notices given or required to be served in this case, be given to and served upon the undersigned at the following office, address, telephone number and email address:

Ryan R. Sweeney, Esquire  
Cleary, Josem & Trigiani, LLP  
325 Chestnut Street, Suite 200  
Philadelphia, PA 19106  
Telephone: (215)735-9099  
Email: [rsweeney@cjtlaw.org](mailto:rsweeney@cjtlaw.org)

The foregoing request includes without limitation, notices of any orders, pleadings, motions, applications, complaints, demands, hearings, requests or petitions, disclosure statements, answering or reply papers, memoranda and briefs in support of any of the foregoing and any other document brought before this Court with respect to these proceedings, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery telephone, telegraph, telex or otherwise that (1) affects or seeks to affect in any way any rights or interest of

any creditor or party in interest in the case, with respect to the (a) debtor, (b) property of the debtor's estate, or proceeds thereof, in which the debtor may claim an interest, or (c) property or proceeds thereof in the possession, custody, or control of others that the debtor may seek to use; or (2) requires or seeks to require any act, delivery of any property, payment or other conduct.

**PLEASE TAKE FURTHER NOTICE** that the Iron Workers Local 11 Benefit Funds, the Iron Workers Local 399 Benefit Funds and the Iron Workers District Council Philadelphia and Vicinity Benefit Funds intend that neither this Notice of Appearance nor any later appearance, pleading, claim or suit, shall waive (1) its right to trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases, whether or not the same be designated legal or private rights, notwithstanding the designation of such matters as "core" proceedings pursuant to 28 U.S.C. § 157(b)(2); (2) its right to have final orders in non-core matters entered only after de novo review by a higher court; or (3) any other rights, claims, actions, defenses, setoffs, or recoupments to which it is or may be entitled under agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses setoff, and recoupments are expressly reserved.

Dated: October 7, 2022  
Philadelphia, Pennsylvania

*CLEARY, JOSEM & TRIGIANI, LLP*

/s/ Ryan R. Sweeney, Esquire  
RYAN R. SWEENEY, ESQUIRE  
325 Chestnut Street, Suite 200  
Philadelphia, PA 19106  
Telephone: (215) 735-9099  
Facsimile: (215) 640-3201